



December 20, 1991

Reply to  
Attn. of: HW-102

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Ronald Rivers  
Venus-Gusmer, Inc.  
1862 Ives Avenue  
Kent, WA 98032

Re: Visual Site Inspection at Espri, Inc. (EPA ID# WAD980639983)

Dear Mr. Rivers:

Per your conversation with Kathryn Gladden of SAIC/TSC on November 15, 1991, this letter is to confirm a visual site inspection (VSI) of Espri, Inc. at 1541 14th Street NW, Auburn, Washington, on December 27, 1991, beginning at 9:00 a.m.

The VSI will be performed by SAIC/TSC, a contractor to the U.S. Environmental Protection Agency (EPA). SAIC/TSC is an authorized contractor of EPA (Contract No. 68-W9-0008) and is acting as field investigators for EPA. The SAIC/TSC investigators may be accompanied by representatives from EPA, the responsible state agency, or both.

This VSI is intended to meet the requirements of two hazardous waste programs administered by EPA, as described below:

1. SUPERFUND: Section 104(e) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), 42 U.S.C. 9604(e) authorizes EPA to gain access to, and request information from, sites where any hazardous substances or pollutants or contaminants may have been generated, stored, treated, disposed of, or transported from.

EPA Region 10 and the Department of Ecology identified Espri, Inc. during preliminary assessment screening as a site which requires additional information to accurately profile the nature and extent of past waste disposal activity at the site.

Epsri, Inc. will be inspected to determine the impact or potential impact on the environment of any hazardous substances which may exist in an uncontrolled manner at this location.

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Enclosed is a CERCLA Information Needs checklist. You must provide the information outlined in the checklist within 30 days of your receipt of this letter, or at the time of the VSI (whichever is later). Failure to do so may subject the facility to enforcement action under Section 104(e) of CERCLA, 42 U.S.C. § 9604(e)(5). Such enforcement action could include the assessment of penalties up to \$25,000 per day of noncompliance. Pursuant to Section 103 of CERCLA, 42 U.S.C. § 9603, it is unlawful for any person knowingly to destroy, mutilate, erase, dispose of, conceal, or otherwise render unavailable or unreadable, or falsify, any of the requested records.

2. RCRA: The Hazardous and Solid Waste Amendments of 1984 (HSWA) establish the authority in the Resource Conservation and Recovery Act (RCRA) program to address releases of hazardous waste or hazardous constituents, including those from solid waste management units (SWMUs). This program applies to operating, closed, or closing RCRA treatment, storage or disposal facilities. The RCRA Facility Assessment (RFA) is a mechanism which the EPA utilizes to carry out the corrective action authorities of HSWA.

Specifically, the RFA is the initial step in the corrective action process. In the RFA, EPA identifies all SWMUs at a facility and determines the potential for releases of waste from the units. The corrective action authorities allow the RCRA program to detect and correct releases from regulated waste management units as well as those units resulting from past waste management practices at RCRA - regulated facilities. Releases to all media (air, soils, and surface and ground waters) from all waste units are within the jurisdiction of the RCRA corrective action program. EPA is currently responsible for implementing this program in Washington, Oregon, and Alaska; Idaho is authorized to implement its own corrective action program.

EPA is currently conducting a RFA for the Espri, Inc. facility.

Section 3007 of RCRA, 42 U.S.C. §6927, authorizes EPA to request certain information from handlers of hazardous waste. Pursuant to §3007 of RCRA (and to facilitate the RFA process) a list of the information you are to provide to the inspectors is enclosed. The title of the list is RCRA Information Needs. All facility records must be reviewed in obtaining the requested information, including the personal recollections of longtime employees and past owners and operators. The requested information must be ready for the inspection team at the time of the VSI, or submitted within 30 days of your receipt of this letter (whichever is later).

Failure to provide the requested information within the specified timeframe may subject the facility to enforcement

action under Section 3008 of RCRA, 42 U.S.C. §6928. Such enforcement action could include the assessment of substantial penalties, up to \$25,000 per day of noncompliance.

The information must be delivered to SAIC at the VSI, or if the VSI is less than 30 days from your receipt of this letter, delivered to SAIC at the following address:


Kathryn Gladden  
SAIC/TSC  
18702 North Creek Parkway, Suite 211  
Bothell, Washington 98011

EPA regulations governing confidentiality of business information are set forth in Part 2, Subpart B of Title 40 of the Code of Federal Regulations. See, 41 Fed. Reg. 36902-36925 (September 1, 1976), as amended by 43 Fed. Reg. 40000 (September 8, 1978), 44 Fed. Reg. 17673 (March 23, 1979), 48 Fed. Reg. 11270 (March 17, 1983) and 50 Fed. Reg. 61661 (December 18, 1985). For any portion of the information submitted which is entitled to confidential treatment, please assert a confidentiality claim in accordance with 40 C.F.R. § 2.200. The information will be disclosed only to the extent, and by means of, the procedures specified in 40 C.F.R. Part 2, Subpart B. EPA will construe the failure to furnish a confidentiality claim with your response to this letter as a waiver of that claim, and information may be made available to the public by EPA without further notice to you.

An agenda for the VSI is enclosed; including a schedule, a preliminary list of SWMUs and areas of concern identified during our file review to be inspected, and lists of RCRA and CERCLA information needs for you to provide to the inspection team. We will be contacting you in the next two weeks to confirm the inspection and make any necessary final arrangements.

If you have any questions regarding this letter or the RFA process, please contact Marcia Bailey (RCRA Site Manager) of my staff at (206) 553-0684.

Sincerely,

  
Randall F. Smith, Acting Director  
Hazardous Waste Division

Enclosures

Agenda

Information needs lists

cc: D. Yasuda, Department of Ecology  
K. Gladden, SAIC/TSC

bc: M. Bailey  
P. Rubenstein/  
D. Robinson ✓

CONCURRENCE					
INITIAL	SEC	MLH	CBH		
NAME	COCHRANE BAILEY	Greenwood	Boyd		
DATE	12/18/91	12/18/91	12/19/91		